



Mobius Legal Group, PLLC

September 7, 2018

VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte Presentation
MB Docket 17-105 *Modernization of Media Regulation Initiative*
MB Docket 18-202 *Children's Television Programming Rules*

Dear Ms. Dortch:

Pursuant to the Commission's *ex parte* rules (47 C.F.R. §1.1206), notice is hereby given that on Thursday, September 6, 2018, undersigned counsel, Jared Weaver and Ansley Erdel of the Alpine Group, and Dave Morgan, President and CEO, and Pete Sniderman, COO of Litton Entertainment ("Litton"), met with Commissioner Michael O'Rielly and Brooke Ericson of his office to discuss the FCC's regulations under the Children's Television Act (CTA) and the pending NPRM referenced above.

Litton discussed its experience as a producer of over 3,600 episodes of educational and informational programming for television stations over the past 30 years, how the market for E/I programming developed after 1990, and the economics of producing high quality E/I content in a very competitive environment.

Litton discussed how moving E/I programming to a multicast stream would destroy the production of new E/I programming because multicast viewership drops over 90 percent from a station's main channel, with a concomitant drop of advertising revenues of over 90 percent. All that will be left of E/I programming in a multicast world will be reruns of already produced programming. The STEM programming offered to teens and their parents will be frozen in time.

Litton also gave Commissioner O'Rielly a copy of a letter (attached) from the American Forces Network (AFN), explaining that Litton provides all of its programming free of charge to AFN and the impact of such new programming on AFN's efforts to integrate that programming into Department of Defense Education Administration ("DoDEA") school curriculum to teach the children of members of the armed forces stationed abroad.

Marlene H. Dortch, Secretary
Federal Communications Commission
September 7, 2018
Page 2

Please contact this office directly with any questions.

Respectfully Submitted,

LITTON ENTERTAINMENT, INC.



James E. Dunstan

Its Attorney

Cc: Commissioner O'Rielly
Brooke Ericson